

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT PERMIT NO. F-06-064
DORIC PRODUCTS, INC.
386 WARREN CHANDLER DR. CORBIN, KENTUCKY
OCTOBER 31, 2006
FROUGH SHERWANI, REVIEWER
PLANT I.D. #: 021-125-00091
AI NUMBER: 38878

SOURCE DESCRIPTION:

The Doric Products is located at Corbin, Kentucky, manufactures metal grave vaults.

On May 05, 2006 the source applied to the Division for the renewal of their conditional major permit F-01-021.

Emission Point: 01 Spray Booth

MP1: High Volume Low Pressure Applicator
MP2: Clean Up

MP1:

This point is for five HVLP spray guns and one Garco airless gun. Only one operator and gun operates in booth at a time. The "PTE" is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2:

This point is for clean up solvent. The consumption of solvent is 0.25 gallon per day. The "PTE" is based on 8760 hrs per year.

Emission Point: 02 Spray Booth

MP1: High Volume Low Pressure Applicator
MP2: Clean Up

MP1:

This point is for three HVLP spray guns and one Garco airless gun. Only one operator and gun operates in booth at a time. The "PTE" is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2:

This point is for clean up solvent. The consumption of solvent is 0.25 gallon per day. The "PTE" is based on 8760 hrs per year

Emission Point: 03 Spray Booth

MP1: High Volume Low Pressure Applicator
MP2: Clean Up

MP1:

This point is for five HVLP spray guns and one Garco airless gun. Only one operator and gun operates in booth at a time. The “PTE” is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2:

This point is for clean up solvent. The consumption of solvent is 0.25 gallon per day. The “PTE” is based on 8760 hrs per year

Emission Point: 04 Spray Booth

MP1 High Volume Low Pressure Applicator
MP2 Clean Up

MP1:

This point is for two HVLP spray guns. Only one operator and gun operates in booth at a time. The “PTE” is based on 18.6 gallons per hour. The assumed transfer efficiency of the system is 70%.

MP2:

This point is for clean up solvent. The consumption of solvent is 0.25 gallon per day. The “PTE” is based on 8760 hrs per year

Emission Point: 05 Space Heaters

This point is for space heaters to heat the source during the winter. Natural gas is used as fuel. There are two heaters with the capacity of 1mmBTU per hr each. This is an insignificant activity.

Emission Point: 06 Welding

This point is for MIG welding. There are 19 machines in the plant. The consumption of electrode is 1.45 lbs per hr per machine. This is an insignificant activity.

Emission Point: 07 Drying Ovens

This point is for drying the product. Propane is used as fuel, natural gas is used as secondary fuel. There are three ovens with the capacity of 90, 500 BTU per hr. This is an insignificant activity.

COMMENTS:

Type of control and efficiency:

Emission points 01, 02, 03 and 04 have fabric filters to control particulate matter. The control efficiency of the filter is assumed to be 95 %.

Emission factors and their source:

AP -42 5th edition, and mass balance are used for the emission factors for PM, VOC and HAPS.

Applicable regulation:

- a. **401 KAR 52:030.** Federally-enforceable permits for non major sources.
- b. **401 KAR 59:010,** New Process Operations (applicable to each affected facility associated with a process operation commenced on or after July 2, 1975)

EMISSION AND OPERATING CAPS DESCRIPTION:

1. The source has accepted a facility-wide cap on annual VOC emissions of no more than 90 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
2. The source has accepted a facility-wide cap on annual individual HAP emission of no more than 9.0 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
3. The source has accepted a facility-wide cap on annual combined HAPS emissions of no more than 22.5 tons per rolling 12-month period. Compliance with this allowable will be demonstrated by record keeping and emissions estimating methodology specified in the terms and conditions of the permit.
4. The permittee shall not cause, suffer, allow, or permit any continuous emission into the open air from a control device or stack associated with any affected facility (s) which is equal to or greater than twenty (20) percent opacity.
5. For emission from a control device or stack, no person shall cause, suffer, allow or permit the emission in to the open air of particulate matter (PM) from any affected facility which in excess of 2.34 lb/hr.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.